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October 21, 2019

FILED VIA CM/ECF

The Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
Courtroom 443
40 Foley Square
New York, NY 10007
CaproniNYSDChambers@nysd.uscourts.gov

Re: *Travelers Casualty and Surety Company of America v. Cohen, Weiss and Simon LLP, et. al.*, Case No. 19-cv-7297 –Consent Request for an
Extension of Time to Respond to the Complaint

Dear Judge Caproni:

Defendants Cohen, Weiss and Simon LLP, Jani K. Rachelson, and Marcelle J. Henry (the “Cohen Weiss Defendants”), with the consent of Plaintiff Travelers Casualty and Surety Company of America (“Travelers”), respectfully request an extension of time to file their response to the Complaint in the referenced action from October 23, 2019 to October 30, 2019. A copy of a proposed order is filed herewith.

As the Court may recall from Travelers’ September 6, 2019 Letter Motion requesting an adjournment of the initial pre-trial conference that was originally scheduled for September 27, 2019 (Docket # 19), the parties have been engaged in mediation and continued discussions regarding possible settlement of both the underlying claims and the instant insurance coverage action. An extension of time to respond to the Complaint will aid in those efforts. Please note the parties are *not* seeking an adjournment of the November 22, 2019 initial pre-trial conference (Docket #22) at this time.

This is the Cohen Weiss Defendants’ first request for an extension. Thank you for your attention to this matter.

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Travelers
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Sincerely,

/s/ Natasha Romagnoli

Natasha Romagnoli
Partner

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRAVELERS CASUALTY AND SURETY
COMPANY OF AMERICA

Plaintiff,

Case No.: 19-cv-7297 (VC)

v.

COHEN, WEISS AND SIMON LLP, DAVID R.
HOCK, JANI K. RACHELSON, and MARCELLE
J. HENRY

Defendants.


USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/21/2019

~~PROPOSED ORDER~~

THE COURT, having considered Defendants COHEN, WEISS and SIMON, LLP, JANI K. RACHELSON, and MARCELLE J. HENRY's letter request for an extension of time to respond to Plaintiff's Complaint, dated October 21, 2019, and good cause appearing therefore, finds as follows: Defendants shall have until October 30, 2019, to file a response to Plaintiff's Complaint.

IT IS SO ORDERED.

Dated: October 21, 2019



Honorable Valerie E. Caproni
United States District Court Judge